

# Exhibit A

Plaintiff's Initial Disclosures

Civil Action No.: 23-cv-00299-GAM

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defamation of Plaintiff, Coach 1's and Haverford College's policies and practices with respect to Title IX and with respect to student-athletes; and [REDACTED].

**C.** Captain A (Defendant - pseudonym known to all parties and the Court)

*Contact information:* To be contacted only through his counsel.

*Subjects of information:* The claims and allegations in the First Amended Complaint, including the false rumor regarding Plaintiff, Plaintiff's removal from the team, the denial of Plaintiff's reinstatement to the team, the punishment, including ostracism and harassment of Plaintiff, the defamation of Plaintiff, Coach 1's and the College's policies and practices with respect to Title IX and with respect to student-athletes; and [REDACTED].

**D.** Student 1 (Defendant - pseudonym known to all parties and the Court)

*Contact information:* To be contacted only through her counsel.

*Subjects of information:* The claims and allegations in the First Amended Complaint, including the false rumor regarding Plaintiff and the defamation of Plaintiff and the College's policies and practices with respect to Title IX and with respect to student-athletes.

**E.** Student 2 (former Haverford student - pseudonym to be identified following discovery of identity of this individual and entry of suitable protective order)

*Contact information:* To be provided, if known, following entry of a suitable protective order.

*Subjects of information:* The claims and allegations in the First Amended Complaint, including the false rumor regarding Plaintiff and the defamation of Plaintiff.

**F.** Student 3 (former Haverford student and co-captain for Plaintiff's team - pseudonym to be identified following entry of suitable protective order)

*Contact information:* To be provided, if known, following entry of a suitable protective order.

*Subjects of information:* The claims and allegations in the First Amended Complaint, including the false rumor regarding Plaintiff, Plaintiff's removal from the team, the denial of Plaintiff's

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reinstatement to the team, the punishment, including ostracism and harassment of Plaintiff, the defamation of Plaintiff, Coach 1's and the College's policies and practices with respect to Title IX and with respect to student-athletes, and [REDACTED].

- G.** Student 4 (former Haverford student and co-captain for Plaintiff's team - pseudonym to be identified following entry of suitable protective order)

*Contact information:* To be provided, if known, following entry of a suitable protective order.

*Subjects of information:* The claims and allegations in the First Amended Complaint, including the false rumor regarding Plaintiff, Plaintiff's removal from the team, the denial of Plaintiff's reinstatement to the team, the punishment, including ostracism and harassment of Plaintiff, the defamation of Plaintiff, Coach 1's and the College's policies and practices with respect to Title IX and with respect to student-athletes, and [REDACTED].

- H.** Student 5 (former Haverford student and teammate of Plaintiff - pseudonym to be identified following entry of suitable protective order)

*Contact information:* To be provided, if known, following entry of a suitable protective order.

*Subjects of information:* The claims and allegations in the First Amended Complaint, including the false rumor regarding Plaintiff, Plaintiff's removal from the team, the denial of Plaintiff's reinstatement to the team, the punishment, including ostracism and harassment of Plaintiff, the defamation of Plaintiff, Coach 1's and the College's policies and practices with respect to Title IX and with respect to student-athletes, and [REDACTED].

- I.** Student 6 (former Haverford student and teammate of Plaintiff - pseudonym to be identified following entry of suitable protective order)

*Contact information:* To be provided, if known, following entry of a suitable protective order.

*Subjects of information:* The claims and allegations in the First Amended Complaint, including the false rumor regarding Plaintiff, Plaintiff's removal from the team, the denial of Plaintiff's reinstatement to the team, the punishment, including ostracism and harassment of Plaintiff, the

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defamation of Plaintiff, Coach 1's and the College's policies and practices with respect to Title IX and with respect to student-athletes, and [REDACTED].

- J.** Student 7 (former Haverford student and teammate of Plaintiff - pseudonym to be identified following entry of suitable protective order)

*Contact information:* To be provided, if known, following entry of a suitable protective order.

*Subjects of information:* The claims and allegations in the First Amended Complaint, including the false rumor regarding Plaintiff, Plaintiff's removal from the team, the denial of Plaintiff's reinstatement to the team, the punishment, including ostracism and harassment of Plaintiff, the defamation of Plaintiff, Coach 1's and the College's policies and practices with respect to Title IX and with respect to student-athletes, and [REDACTED].

- K.** Student 8 (former Haverford student and teammate of Plaintiff - pseudonym to be identified following entry of suitable protective order)

*Contact information:* To be provided, if known, following entry of a suitable protective order.

*Subjects of information:* The claims and allegations in the First Amended Complaint, including the false rumor regarding Plaintiff, Plaintiff's removal from the team, the denial of Plaintiff's reinstatement to the team, the punishment, including ostracism and harassment of Plaintiff, the defamation of Plaintiff, Coach 1's and the College's policies and practices with respect to Title IX and with respect to student-athletes, and [REDACTED].

- L.** Student 9 (former Haverford student and teammate of Plaintiff - pseudonym to be identified following entry of suitable protective order)

*Contact information:* To be provided, if known, following entry of a suitable protective order.

*Subjects of information:* The claims and allegations in the First Amended Complaint, including the false rumor regarding Plaintiff, Plaintiff's removal from the team, the denial of Plaintiff's reinstatement to the team, the punishment, including ostracism and harassment of Plaintiff, the defamation of Plaintiff, and [REDACTED].

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- M.** Student 10 (former Haverford student and teammate of Plaintiff – pseudonym to be identified following entry of suitable protective order)

*Contact information:* To be provided, if known, following entry of a suitable protective order.

*Subjects of information:* The claims and allegations in the First Amended Complaint, including the false rumor regarding Plaintiff, Plaintiff's removal from the team, the denial of Plaintiff's reinstatement to the team, the punishment, including ostracism and harassment of Plaintiff, the defamation of Plaintiff, Coach 1's and the College's policies and practices with respect to Title IX and with respect to student-athletes, and [REDACTED].

- N.** Student 11 (former Haverford student and teammate of Plaintiff - pseudonym to be identified following entry of suitable protective order)

*Contact information:* To be provided, if known, following entry of a suitable protective order.

*Subjects of information:* The claims and allegations in the First Amended Complaint, including the false rumor regarding Plaintiff, Plaintiff's removal from the team, the denial of Plaintiff's reinstatement to the team, the punishment, including ostracism and harassment of Plaintiff, the defamation of Plaintiff, Coach 1's and the College's policies and practices with respect to Title IX and with respect to student-athletes, and [REDACTED].

- O.** Student 12 (former Haverford student and teammate of Plaintiff - pseudonym to be identified following entry of suitable protective order)

*Contact information:* To be provided, if known, following entry of a suitable protective order.

*Subjects of information:* The claims and allegations in the First Amended Complaint, including the false rumor regarding Plaintiff, Plaintiff's removal from the team, the denial of Plaintiff's reinstatement to the team, the punishment, including ostracism and harassment of Plaintiff, the defamation of Plaintiff, Coach 1's and the College's policies and practices with respect to Title IX and with respect to student-athletes, and [REDACTED].

- P.** Kimberly F. Taylor (Haverford's Title IX Coordinator)

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*Contact information:* To be contacted only through Haverford's counsel.

*Subjects of information:* The claims and allegations in the First Amended Complaint, including the false rumor regarding Plaintiff, Plaintiff's removal from the team, the denial of Plaintiff's reinstatement to the team, the punishment, including ostracism, harassment, and physical assault of Plaintiff, the defamation of Plaintiff, Coach 1's and the College's policies and practices with respect to Title IX and with respect to student-athletes; and [REDACTED]

[REDACTED].

**Q.** Danielle Lynch (Haverford's Director of Athletics)

*Contact information:* To be contacted only through Haverford's counsel.

*Subjects of information:* The claims and allegations in the First Amended Complaint, including the false rumor regarding Plaintiff, Plaintiff's removal from the team, the denial of Plaintiff's reinstatement to the team, the punishment, including ostracism, harassment, and physical assault of Plaintiff, the defamation of Plaintiff, Coach 1's and the College's policies and practices with respect to Title IX and with respect to student-athletes, and [REDACTED]

[REDACTED].

**R.** Kelly Wilcox (Senior Associate Dean of Haverford)

*Contact information:* To be contacted only through Haverford's counsel.

*Subjects of information:* The claims and allegations in the First Amended Complaint, including the false rumor regarding Plaintiff, Plaintiff's removal from the team, the denial of Plaintiff's reinstatement to the team, the punishment, including ostracism, harassment, and physical assault of Plaintiff, the defamation of Plaintiff, Coach 1's and the College's policies and practices with respect to Title IX and with respect to student-athletes, and [REDACTED]

[REDACTED].

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**S.** Barbara Hall (Advising Dean of Haverford)

*Contact information:* To be contacted only through Haverford's counsel.

*Subjects of information:* The claims and allegations in the First Amended Complaint, including the false rumor regarding Plaintiff, Plaintiff's removal from the team, the denial of Plaintiff's reinstatement to the team, the punishment, including ostracism, harassment, and physical assault of Plaintiff, the defamation of Plaintiff, Coach 1's and the College's policies and practices with respect to Title IX and with respect to student-athletes, and [REDACTED]

[REDACTED].

**T.** John McKnight (Dean of the College for Haverford)

*Contact information:* To be contacted only through Haverford's counsel.

*Subjects of information:* The claims and allegations in the First Amended Complaint, including the false rumor regarding Plaintiff, Plaintiff's removal from the team, the denial of Plaintiff's reinstatement to the team, the punishment, including ostracism, harassment, and physical assault of Plaintiff, the defamation of Plaintiff, Coach 1's and the College's policies and practices with respect to Title IX and with respect to student-athletes, and [REDACTED]

[REDACTED].

**U.** Wendy Raymond (Haverford's President)

*Contact information:* To be contacted only through Haverford's counsel.

*Subjects of information:* The claims and allegations in the First Amended Complaint, including the false rumor regarding Plaintiff, Plaintiff's removal from the team, the denial of Plaintiff's reinstatement to the team, the punishment, including ostracism, harassment, and physical assault of Plaintiff, the defamation of Plaintiff, Coach 1's and the College's policies and practices with



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respect to Title IX and with respect to student-athletes, and [REDACTED]

[REDACTED].

- V. Jane Doe (Plaintiff's mother - pseudonym to be identified following entry of suitable protective order)

*Contact information:* Ms. Doe may only be contacted through the undersigned counsel.

*Subjects of information:* The claims and allegations in the First Amended Complaint, including the false rumor regarding Plaintiff, Plaintiff's removal from the team, and the denial of Plaintiff's reinstatement to the team.

- W. Robert Doe (Plaintiff's father – pseudonym to be identified following entry of suitable protective order)

*Contact information:* Mr. Doe may only be contacted through the undersigned counsel.

*Subjects of information:* The claims and allegations in the First Amended Complaint, including the false rumor regarding Plaintiff, Plaintiff's removal from the team, and the denial of Plaintiff's reinstatement to the team.

**II. Description by category and location of all documents, electronically stored information, and tangible things that Plaintiff has in his possession, custody, or control and may use to support his claims, unless the use would be solely for impeachment**

The following is a description by category of documents, electronically stored information and tangible things that Plaintiff has in his possession, custody, or control and that he may use to support his claims in this matter—unless the use would be solely for impeachment:

- Haverford College Sexual Misconduct Policy (revised Aug. 25, 2020)  
(contemporaneously produced at JDOE000001-JDOE000037);
- Haverford College Student-Athlete Handbook (Sept. 1, 2019) (contemporaneously produced at JDOE000038-JDOE000062);

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- Haverford College Student-Athlete Handbook (falsely dated Sept. 1, 2019 and surreptitiously modified in or around November 2022) (contemporaneously produced at JDOE000063-JDOE000087).
- Emails between Plaintiff and Coach 1 regarding Plaintiff's exclusion from team and attempts at reinstatement;
- Emails between Plaintiff and former teammates regarding Plaintiff's exclusion from team and attempts at reinstatement;
- Emails between Plaintiff and Haverford administrators regarding Plaintiff's exclusion from team, attempts at reinstatement, Student 1's defamatory statements, and harassment directed at Plaintiff;
- Letters sent by Robert Doe and his mother (John's grandmother) to Haverford's administration;
- Letters exchanged between counsel for Plaintiff and Defendants Haverford College and Coach 1 prior to the filing of this litigation; and
- Student 1's defamatory statements posted about Plaintiff on March 27, 2022.

**III. Computation of each category of damages claimed by Plaintiff**

Plaintiff's damages include:

- all monies paid by John and/or his family to Defendant for the Spring 2022 semester, the Fall 2023 semester, and the Spring 2023 semesters, in the approximate amount of \$122,355.
- loss of educational and athletic opportunities;
- actual harm to Plaintiff's reputation;
- emotional distress, mental anguish, and humiliation;

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- physical manifestations of emotional distress;
- expenses for medical and psychological treatment, therapy, and counseling incurred as a result of Plaintiff's exclusion from team, presently in the approximate amount of \$21,475;
- costs and expenses of suit; and
- punitive damages.

**IV. Any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in this action or to indemnify or reimburse for payments made to satisfy the judgment.**

None.

Respectfully,

/s/ Jonathan Z. Cohen

Jonathan Z. Cohen (PA Id. No. 205941)

Patricia M. Hamill (PA Id. No. 48416)

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*Attorneys for Plaintiff John Doe*

Date: November 7, 2023

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**CERTIFICATE OF SERVICE**

I hereby certify that the above Plaintiff John Doe's Initial Disclosures Under Federal Rule of Civil Procedure 26(a)(1) were served by email on November 7, 2023 on the following counsel of record:

Joshua W.B. Richards, Esq.  
[joshua.richards@saul.com](mailto:joshua.richards@saul.com)

Levy R. Schy, Esq.  
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/s/ Jonathan Z. Cohen

*Attorneys for Plaintiff John Doe*

Date: November 7, 2023